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March 22, 2023

Via ECF

Honorable Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Elfe v. 26 Motors Corp., et al., 22-CV-9385 (RA)

Dear Judge Abrams:

My office, together with co-counsel, represents the plaintiff, Glenn C. Elfe, in the above-referenced auto-fraud case against Defendants 26 Motors Corp, Kyle Merritt, Chino Germinal Lantigua, John Doe #3 a/k/a Manager, Wells Fargo Bank, N.A., L.J. Marchese Chevrolet, Inc., and Michelle Bailey.

I am writing to request that Your Honor grant an extension until May 22, 2023, of the deadline to make service on Defendant Chino Germinal Lantigua. I am making this request because the process server Plaintiff hired to make service at the employment address in Florida provided by Defendant 26 Motors Corp. has not been able to locate Mr. Lantigua. *See Exhibit A*, attached.

Furthermore, the private detective Plaintiff hired to try to skip-trace Mr. Lantigua has been unable to find him based solely on the new work-address provided. The detective has requested more information—for example, Mr. Lantigua’s Social Security Number, his date of birth, or his prior residential address. Plaintiff requests that this Court not stay paper discovery, because it is precisely this paper discovery that will assist Plaintiff in tracking down and serving Mr. Lantigua. But depositions may have to wait until Mr. Lantigua has been joined, so he is not prejudiced and so that depositions do not have to be taken twice.

Respectfully,

/s/ Brian L. Bromberg
Brian L. Bromberg

cc: All Attorneys of Records (Via ECF)